

NRC INSPECTION MANUAL

PART 9900: TECHNICAL GUIDANCE

STS6516.TG

STANDARD TECHNICAL SPECIFICATIONS SECTIONS 6.5.1.6c and 6.5.2.7d - LICENSEE REVIEW RESPONSIBILITIES FOR PROPOSED CHANGES TO FACILITY TECHNICAL SPECIFICATIONS

A. PURPOSE

To provide guidance to the inspector concerning the NRC intent of Items 6.5.1.6c and 6.5.2.7.d of the Standard Technical Specifications which define the responsibilities of the Unit Review Group and Company Nuclear Review and Audit Group concerning review of proposed changes to the technical specifications of the operating license.

B. DISCUSSION

It appears that a disparity exists in the review of proposed technical specification change requests by licensee review committees. All licensees have requirements that the plant (on-site) and the corporate (off-site) review committees review proposed changes to the technical specifications. It appears that some licensees have full committee reviews prior to submission of a proposed change to the NRC, while others either postpone the reviews until the next regularly scheduled meeting of the committees or have subcommittees review the proposed change. Because the technical specifications are not explicit as to when these required reviews must be completed, the following information is provided to clarify the NRC position regarding this matter so that a consistent approach will be followed by all licensees:

1. Unit Review Group. The Unit Review Group is required to meet on a monthly basis and members of the group are, for the most part, members of the plant operating staff. As a result, no problem should exist to preclude a full Unit Review Group meeting for approval of proposed changes to Facility Technical Specifications prior to submission to the NRC.

Based on the above, it is the NRC position that the Unit Review Group meet in quorum and approve all proposed changes to the Facility Technical Specifications prior to submittal for NRC review.

2. Company Nuclear Review and Audit Group (CNRAG). The CNRAG consists of members of corporate management and possibly

consultants and is required to meet on a semiannual basis. It is recognized that problems associated with attempting to convene a quorum of these officials on short notice will be experienced. However, the NRC does not approve of ballot review techniques and considers routing or telephone polling as unacceptable alternatives. It is the NRC position that the use of subcommittees for

review of proposed changes to Facility Technical Specifications or the operating license is acceptable provided the following conditions are met:

- a. The appointed subcommittee consists of persons with diverse backgrounds, preferably approximately three members of the Corporate Review Committee, of which no more than a minority has line responsibility for operation of the facility, and
- b. The proposed change is reviewed by the full committee at its next regularly scheduled meeting.

C. REFERENCE

Memorandum T. M. Novak, NRR to J. H. Snizek, IE, dated November 26, 1980.

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